

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GREAT WESTERN INSURANCE COMPANY,		:
		:
Plaintiff,		:
v.		:
		:
MARK GRAHAM, DONALD SOLOW, BLUE		:
CAPITAL MANAGEMENT, INC., BLUE		:
ALTERNATIVE ASSET MANAGEMENT LLC,		:
WILMINGTON SAVINGS FUND SOCIETY, FSB,		:
CHRISTIANA TRUST, REGATTA HOLDINGS		:
LLC, CYGNET 001 MASTER TRUST, CYGNET		:
001 MASTER TRUST SERIES 2011-A, CYGNET	CIVIL ACTION NO.	:
001 MASTER TRUST SERIES 2011-C, CYGNET	18-cv-06249 (VSB)	:
MASTER TRUST SERIES 2013-A, ALPHA RE		:
LIMITED, ALPHA RE HOLDINGS (CAYMAN)		:
LIMITED, ATLANTIC SPECIALTY FINANCE,		:
BLUE ELITE FUND LTD., BLUE ELITE FUND		:
LP, BLUE II LTD., SANCUS CAPITAL BLUE		:
CREDIT OPPORTUNITIES FUND LTD.,		:
ABILITY INSURANCE COMPANY, JOHN		:
DRAKE, EDWARD BRENDAN LYNCH, AND		:
GREGORY TOLERAM,		:
		:
Defendants.		:
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**RULE 7.1 CORPORATE DISCLOSURE STATEMENT
OF BLUE DEFENDANTS**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for Defendants Blue Capital Management Inc. (“BCM”), Blue Alternative Asset Management LLC (“BAAM”), Blue Elite Fund, Ltd., Blue Elite Fund L.P., and Blue II, Ltd. certifies the following:

1. BCM is a private non-governmental party with no parent corporation, and no publicly held corporation owns 10% or more of its stock.

2. BAAM is a private non-governmental party with no parent corporation, and no publicly held corporation owns 10% or more of its stock.

3. Blue Elite Fund Ltd. is a private non-governmental party with no parent corporation, and no publicly held corporation owns 10% or more of its stock.

4. Blue Elite Fund L.P. is a private non-governmental party with no parent corporation, and no publicly held corporation owns 10% or more of its stock.

5. Blue II, Ltd. is a private non-governmental party with no parent corporation, and no publicly held corporation owns 10% or more of its stock.

Dated: November 1, 2018
Newark, New Jersey

/s/ Eric R. Breslin
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Management, LLC, Blue Elite Fund, Ltd.,
Blue Elite Fund, L.P., Blue II, Ltd.,*